

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

WIPQTUS INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 1:24-mc-113

Related to Civil Action No. 2:23-cv-00054-  
RWS-RSP

RENESAS ELECTRONICS AMERICA INC.,

Intervenor-Plaintiff,

v.

WIPQTUS INC.,

Intervenor-Defendant.

**NOTICE OF ASHOK TANKHA’S MOTION TO QUASH SUBPOENA**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Ashok Tankha dated March 10, 2024, and all exhibits thereto, and the accompanying Memorandum of Law, third-party to the above captioned related matter, Ashok Tankha (“Tankha”), will move this Court, on a date and time to be selected by the Court, for an Order, pursuant to F.R.C.P. 45(d)(3) transferring the case to the District Court for the Eastern District of Texas so that the court may quash the

subpoena served by Intervenor-Plaintiff Renesas Electronics America Inc. or issue a protective order regarding the material sought.

Dated: March 11, 2024

Respectfully submitted,  
/s/ Jason R. Melzer  
Jason R. Melzer, Esq.

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